

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

**JOHN P. SOUSA, SR.
ARGENTINA R. SOUSA,**

DEBTORS.

**Case No.: BK-13-13511-NLJ
Chapter 13**

RESPONSE TO OBJECTION TO CLAIM BY DEBTORS

Comes now the secured creditor, WELLS FARGO BANK, N.A., by their attorney, Robert J. Hauge, and responds to Objection to Claim Number 30 filed by the Debtors on January 8, 2014:

1. WELLS FARGO BANK, N.A. is the holder of a purchase money note and mortgage on the Debtor's residence (the "Property"). The note has an outstanding balance of \$121,639.33 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. This response is to protect Creditor's rights regarding its proof of claim and Creditor reserves the right to supplement this response. Counsel for WELLS FARGO BANK, N.A. is currently researching the items raised in the Objection.

WHEREFORE, PREMISES CONSIDERED, WELLS FARGO BANK, N.A. prays this Court deny the Objection; and for such further relief as this Court deems appropriate.

WELLS FARGO BANK, N.A.,

By: s/ Robert J. Hauge
Robert J. Hauge - #20007
Baer, Timberlake, Coulson & Cates, P.C.
6846 South Canton, Suite 100
Tulsa, Oklahoma 74136
Telephone: (918) 491-3100
Facsimile: (918) 491-5424
Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Response with postage thereon fully prepaid to the parties listed below on January 29, 2014.

John P Sousa Sr
Argentina R Sousa
2640 SW 105th
Oklahoma City, OK 73170

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Philip A. Hurtt
1525 SW 89th
Oklahoma City, OK 73159

By: s/ Robert J. Hauge
Robert J. Hauge